

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)	Criminal No. 19-295 (PJS/TNL)
)	
v. Plaintiff,)	
)	DEFENDANT'S PRETRIAL MOTION
JULIA RENE AYERS,)	TO DISCLOSE AND MAKE
)	INFORMANTS AVAILABLE FOR
Defendant.)	INTERVIEW

Julia Rene Ayers, by and through her undersigned attorney, has filed notice of an entrapment defense. (ECF Doc. 20) The informant used in this case was a government actor in Ms. Ayers' entrapment. Thus, Julia Rene Ayers, by and through counsel, hereby moves the Court for an Order requiring the government to immediately disclose:

- 1) the identity of the informant utilized by the government in the investigation of Ms. Ayers,
- 2) the prior criminal convictions of the informant,
- 3) an updated, chronological list of every communication between law enforcement and the informant, including texts, emails and notes from all phone calls and communications with the informant,
- 4) any recorded or noted phone calls, texts or notes regarding the informant's communications with Ms. Ayers,
- 5) all aliases used by the informant, dates when the aliases were used, and the corresponding crimes and convictions of the informant used under these aliases,
- 6) a log or record keeping of all payments made to the informant for his cooperation against Ms. Ayers and others,

- 7) the circumstances involving the informant becoming an informant for law enforcement, and
- 8) all communications between the law enforcement working with the informant and any other law enforcement, agency or attorney prosecuting or probation officer supervising the informant in connection with a criminal case.

Additionally, counsel respectfully requests that the Order instruct the government to make the informant available for interview in preparation for trial.

Ms. Ayers submits that this information is discoverable under Federal Rule of Evidence 16 (a)(A), (B), (E)(i) and potentially exculpatory under *Brady v. Maryland*, 373 U.S. 83 (1963), *Giglio v. United States*, 405 U.S. 150 (1972), and their progeny. However, understanding the sensitive nature of the material sought, counsel agrees to abide by the terms of a protective order.

This motion is based on the indictment, the records and files in the above-entitled action, and any and all other matters which may be presented prior to or at the time of the hearing of said motion.

Dated: December 11, 2019

Respectfully submitted,

s/Shannon Elkins

SHANNON ELKINS
Attorney ID No. 332161
Attorney for Ms. Ayers
107 U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415